

PAUL R. HAFFEMAN
DAVIS, HATLEY, HAFFEMAN & TIGHE, P.C.
The Milwaukee Station, Third Floor
101 River Drive North
P.O. Box 2103
Great Falls, MT 59403-2103
Telephone: 406-761-5243
Facsimile: 406-761-4126
paul.haffeman@dhhtlaw.com
Attorneys for Plaintiff

FILED
NOV 02 2017
b) LISA J. SINTON Date
Clerk
by _____ Deputy

MONTANA NINTH JUDICIAL DISTRICT COURT, TETON COUNTY

.....
JOANNE S. BOROEVICH,

CAUSE NO. DV-17-037

Plaintiff,

-VS-

DUECK BROTHERS TRUCKING, LTD.,
HENRY W. HOFMAN, AND DOES 1-
5,

**COMPLAINT AND
JURY DEMAND**

Defendants.
.....

COMES NOW the Plaintiff, Joanne Boroevich, and for her Complaint alleges
as follows:

1. Plaintiff, Joanne Boroevich (Joanne), is and was at all times relevant hereto a citizen of the State of Washington.
2. Defendant, Dueck Brothers Trucking, LTD. (Dueck Brothers), is and was at all times relevant hereto a Canadian Company, and employer of Defendant William W. Hofman (Hofman). As such, Dueck Brothers is legally responsible for all of Hofman's negligent acts referenced herein.

3. Hofman is and was at all times relevant hereto a Canadian citizen, and was at all times relevant hereto in the course and scope of his employment with Dueck Brothers.

4. Does 1-5 are other persons or entities not yet identified who are or may be liable for Joanne's injuries and resulting damages referenced herein.

COUNT I

5. Plaintiff restates and incorporates by reference all of the allegations set forth in ¶¶ 1-4 above.

6. On January 19, 2015, Hofman negligently operated a tractor and trailer owned by Dueck Brothers in Teton County, Montana, causing Joanne severe personal injuries and resulting damages.

7. Dueck Brothers and Hofman are liable for all damages sustained by Joanne resulting from Hofman's negligence in an amount to be determined by a jury at trial.

COUNT II

8. Plaintiff restates and incorporates by reference all of the allegations set forth in ¶¶ 1-7 above.

9. Dueck Brothers was negligent in hiring, training, supervising and allowing Hofman to drive its tractor and trailer on the date and time of the motor vehicle collision at issue in this case.

10. The conduct of Dueck Brothers in negligently hiring, training, supervising and allowing Hofman to drive its tractor and trailer on the date and time

of the motor vehicle collision at issue in this case caused or contributed to such collision. As such, Dueck Brothers is liable for all damages sustained by Joanne resulting from its own negligence in an amount to be determined by a jury at trial.

WHEREFORE, Plaintiff prays for a judgment against Defendants awarding her the damages that she has sustained, Plaintiff's allowable costs and disbursements, and such additional relief as the Court deems appropriate under the circumstances of this case.

DATED this 31st day of October, 2017.

DAVIS, HATLEY, HAFFEMAN & TIGHE, P.C.

BY PAUL R. HAFFEMAN

PAUL R. HAFFEMAN
P.O. Box 2103
Great Falls, MT59403-2103
Attorneys for Plaintiff

JURY DEMAND

Plaintiff hereby demands a jury trial on all issues herein triable to a jury.

DATED this 31st day of October, 2017.

DAVIS, HATLEY, HAFFEMAN & TIGHE, P.C.

BY PAUL R. HAFFEMAN

PAUL R. HAFFEMAN
P.O. Box 2103
Great Falls, MT59403-2103
Attorneys for Plaintiff